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1	BELLON & MANINGO, LTD.
2	LANCE A. MANINGO, ESQ. Nevada Bar No.: 006405
3	732 S. Sixth Street, Suite 102
	Las Vegas, Nevada 89101
4	Telephone: (702) 452-6299 Facsimile: (702) 452-6298
5	Email: lam@bellonandmaningo.com
6	Attorney for Defendant
7	MARC BRATTIN
	UNITED STATES DISTRICT COURT
8	DISTRICT OF NEW ADA
9	DISTRICT OF NEVADA
10	THE UNITED STATES OF AMERICA,)
11) 2:13-cr-00161-APG-CWH Plaintiff,
12	ý
	vs.
13	MARC BRATTIN,
14	
15	Defendant.)
16	
17	UNOPPOSED MOTION TO MODIFY TRAVEL RESTRICTIONS
3 / 1	I OTIOTA ONED MOTION TO MODELL MATERIALISMOST MEDICALIONS

Defendant, MARC BRATTIN, by and through his attorney, LANCE A. MANINGO, ESQ., of BELLON & MANINGO, LTD., moves this court for an Order to temporarily modify the travel restrictions placed on Mr. Brattin pursuant to the Order Setting Conditions of Release. //// //// //// ////

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This Motion is made and based upon the Points and Authorities herein and the papers and pleadings previously on file in this matter.

DATED this 30th day of July, 2013.

BELLON & MANINGO, LTD.

/s/ Lance A. Maningo

By:

LANCE A. MANINGO, ESO. Nevada Bar No.: 006405 732 S. Sixth Street, Suite 102 Las Vegas, Nevada 89101 Attorney for Defendant MARC BRATTIN

POINTS AND AUTHORITIES

- 1. The Defendant Marc Brattin and his family take an annual family vacation to the Lake Tahoe area every year. While in Lake Tahoe, Mr. Brattin and his family typically spend time in Lake Tahoe in both the State of Nevada and the State of California.
- 2. On May 6, 2013, an Order Setting Conditions of Release was filed. In said Order, condition 8(g) requires that Mr. Brattin abide by the following restrictions on personal association, place of abode - within the District of Nevada. Mr. Brattin has been in compliance with said Order.
- Undersigned counsel contacted AUSA Sarah E. Griswold regarding the 3. planned family vacation and asked if she was agreeable to making a slight modification to the travel restrictions placed on Mr. Brattin. Ms. Griswold indicated that she is not opposed to modifying the current travel restrictions to allow Mr. Brattin and his family to travel to Lake Tahoe in the State of California during his family vacation scheduled for August 3, 2013 through September 3, 2013.

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4. After speaking with Ms. Griswold, undersigned counsel contacted Mr.
Brattin's Pretrial Services Officer – Officer Barlow to inquire about her position regarding the
above modification. Officer Barlow stated that she too is agreeable to the travel arrangement
as long as all other conditions of release are met.

- 5. To that end, Officer Barlow made the necessary arrangements for Mr. Brattin to be randomly drug tested pursuant to the Conditions of Release Order, if necessary, in Reno while he is on his vacation. Mr. Brattin is aware of this and the fact that he must stay in compliance with all other Conditions of Release and has assured undersigned counsel that he would maintain full compliance with all court imposed conditions.
- 6. Counsel respectfully requests that this Court consider the above facts and circumstances and order that the Condition of Release preventing Mr. Brattin from traveling out of the State of Nevada be temporarily modified to allow Mr. Brattin to travel the State of California in the Lake Tahoe area for his scheduled family vacation from August 3, 2013 through September 3, 2013.

DATED this 31st day of July, 2013.

BELLON & MANINGO, LTD.

/s/ Lance A. Maningo

By: LANCE A. MANINGO, ESQ. Attorney for Petitioner MARC BRATTIN

IT IS SO ORDERED.

Dated this 1st day of August, 2013.

TATES MAGISTRATE JUDGE